

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JOYCE CHRISTIE	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 05-11830 NMG
	)	
HARTFORD LIFE GROUP INSURANCE	)	
COMPANY as successor to CNA GROUP	)	
LIFE ASSURANCE COMPANY	)	
Defendant.	)	
	)	

**JOINT MOTION TO MODIFY SCHEDULING ORDER**

Now come Plaintiff, Joyce Christie (“Plaintiff”), and Defendant, Hartford Life Group Insurance Company (“Defendant”), (“hereinafter collectively referred to as “the Parties”) and hereby respectfully request that the Court grant a two-month extension of the dates contained in the Scheduling Order.

In support of their Joint Motion to Modify the Scheduling Order, the Parties state that: (1) the current deadline for all depositions other than expert depositions is June 30, 2006; (2) this is the first discovery extension the Parties have requested from this Court; (3) the Parties have encountered difficulty in the scheduling of the deposition of Plaintiff’s employer due to the unavailability of the witness; and (4) the Court has scheduled an ADR Conference for October 5, 2006.

On January 9, 2006, the Court entered a Scheduling Order including the following deadlines: (1) Non expert depositions 6/30/06; (2) Plaintiff expert designations 7/18/06, defendants 8/31/06; (3) Expert depositions 9/30/06; (4) Dispositive Motions 10/31/06. See

Scheduling Order, attached hereto at Exhibit A. This is the first extension to the deadlines set forth in the Scheduling Order that the Parties have requested.

In addition, the Parties have encountered difficulty in the scheduling of Plaintiff's employer's 30(b)(6) deposition due to the unavailability of the witness. On or about April 24, 2006, Defendant noticed a 30(b)(6) deposition of Plaintiff's former employer. Subsequently, the attorney for Plaintiff's former employer informed Defendant's counsel that the witness with the most knowledge and the best ability to respond to the topics identified in the 30(b)(6) depositions subpoena was out on leave due to a car accident. The attorney for Plaintiff's former employer also informed Defendant's counsel that the witness would be available to testify in late July/early August.

Furthermore, the Court has scheduled an ADR Conference for October 5, 2006. Extending the Scheduling Order deadlines would allow the parties to conserve the resources that would be required for them to prepare dispositive motions at the same time that the Court is attempting to assist the Parties in resolving this matter through the October 5, 2006 ADR conference.

Due to the impending deposition deadline, the unavailability of the 30(b)(6) witness for Plaintiff's former employer until late July/early August, the October 5 ADR Conference, and the fact that this is the first extension the Parties have sought with respect to the deadlines set forth in the Scheduling Order, the Parties respectfully request that the deadlines be extended as follows:

1. All non-expert depositions complete by 08/30/06.
2. Plaintiff expert designations due by 09/18/06.
3. Defendants' expert designations due by 10/31/06.
4. All expert depositions complete by 11/30/06.

5. Dispositive Motions due 12/31/06.

Respectfully Submitted,

Plaintiff Joyce Christie

By her attorney,

/s/Jonathan M. Feigenbaum

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Defendant Hartford Life Group Insurance  
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By its attorney,

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**CERTIFICATE OF SERVICE**

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on this 9<sup>th</sup> day of June, 2006.

/s/Katherine R. Parsons

# **EXHIBIT A**

**David Crevier - Activity in Case 1:05-cv-11830-NMG Christie v. Hartford Life Group Insurance Company "Scheduling Conference"**

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**From:** <ECFnotice@mad.uscourts.gov>  
**To:** <CourtCopy@mad.uscourts.gov>  
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**United States District Court**

**District of Massachusetts**

**Notice of Electronic Filing**

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**Case Name:** Christie v. Hartford Life Group Insurance Company

**Case Number:** 1:05-cv-11830

**Filer:**

**Document Number:**

**Docket Text:**

ElectronicClerk's Notes for proceedings held before Judge Nathaniel M. Gorton : Scheduling Conference held on 12/20/2005. Automatic discovery 1/3/06, amendment and or supplements 3/31/06. Written discovery served 4/30/06, responded to 5/31/06. Non expert depositions 6/30/06. Plaintiff expert designations 7/18/06, defendants 8/31/06. Expert depositions 9/30/06. Dispositive motions 10/31/06. REFER TO ADR 4/06. Jury Trial set for 2/5/2007 09:00 AM in Courtroom 4 before Judge Nathaniel M. Gorton. Pretrial Conference set for 1/17/2007 03:00 PM in Courtroom 4 before Judge Nathaniel M. Gorton. (Nicewicz, Craig)

The following document(s) are associated with this transaction:

**1:05-cv-11830 Notice will be electronically mailed to:**

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